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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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In Re: GUIDANT CORP. IMPLANTABLE  
DEFIBRILATORS PRODUCTS LIABILITY  
LITIGATION

MDL No. 05-1708(DWF/AJB)

HARRY BROTHERS, ET AL.

Plaintiff(s),

Case No: 07-cv-2850 (DWF/AJB)

v.

GUIDANT CORPORATION, et. al.,  
Defendant(s).

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MOTION TO WITHDRAW AS COUNSEL OF RECORD WITHOUT SUBSTITUTION FOR  
PLAINTIFF BETTY FERRELL *ONLY*


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Pursuant to Rule 83.7(c) of the Local Rules of the United States District Court for the District of Minnesota, the undersigned attorney hereby requests the Court and counsel that Whatley Drake and Kallas, L.L.C., currently listed as counsel of record for Plaintiff Betty Ferrell wishes to withdraw as counsel for Plaintiff Betty Ferrell in this case for the following reasons:

Despite multiple attempts and diligent efforts by counsel to obtain Plaintiffs' signed release of the defendant in this matter, Plaintiff has not signed the required release. Plaintiffs' failure to sign has created irreconcilable differences with counsel.

This office has communicated with the client, Betty Ferrell, and has informed them of our intent to withdraw as counsel of record, and has served them with a copy of the Motion to Withdraw simultaneously with the filing of this motion with the Court.

Dated: September 4, 2008

A handwritten signature in black ink, appearing to read "E. Ashley Cranford", is written over a horizontal line.

E. Ashley Cranford  
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